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March 20, 2020

**BY ECF**

Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Rachel Wellner v. City of New York, et al.,  
16-CV-07032 (JGK) (JLC)

Your Honor:

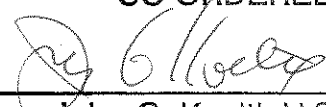
I am a one of the attorneys assigned to represent the defendants in this matter. Defendants write jointly with plaintiff's counsel to respectfully request a thirty-day enlargement of the remaining pre-trial deadlines in this matter in light of the ongoing COVID-19 pandemic.

On January 9, 2020, the parties attended a status conference. At that time, the Court issued an Order directing the parties to file requests to charge, proposed voir dire, and motions in limine by April 6, 2020, in advance of the re-trial of this matter, presently scheduled to begin on July 20, 2020 (ECF No. 241).

The parties have been conferring regarding these pre-trial filings, and plaintiff's counsel has already prepared an initial draft of the joint pre-trial order, which the parties are scheduling time to discuss. However, due to the ongoing public health crisis, the parties will need additional time to complete these filings. This request is made because counsel for all parties are transitioning to working remotely in order to comply with evolving guidance and mandates regarding social distancing and workforce limitations. In particular, counsel for the defendants have been under instructions to work remotely since Monday, March 16, 2020. The transition to remote work has come with limitations on access to electronic file storage systems and other resources, in addition to restricting access to physical case materials.

For the foregoing reasons, the parties respectfully request a thirty-day extension of time to file a joint pre-trial order, requests to charge, proposed voir dire, and motions *in limine*, and a corresponding extension of the time to respond or oppose.

APPLICATION GRANTED  
SO ORDERED

3/22/20   
John G. Koeltl, U.S.D.J.